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APR 07 2015

Office of Enforcement, Compliance
and Environmental Justice

Janis Robinson
US EPA, Region VIII (8ENF-AT)
1595 Wyncoop Street
Denver, Colorado 80202

Re: Frederick Compressor Station Audit
Findings

Dear Ms. Robinson:

This is pertaining to the letter sent to Anadarko Petroleum Corporation on January 26, 2015, and received at our office on February 3, 2015, regarding a Finding of Violation (FOV) due to a Clean Air Act (CAA) section 112(r)(7) inspection, which was performed on December 11, 2014.

Please note the following actions that have been completed/in process for the deficient items listed below:

1. **Prevention Program – Process hazard Analysis (PHA) [68.68(e)]**

Assure that the recommendations are resolved in a timely manner and that the resolution is documented.

- Several recommendations from the October 2013 PHA have not been resolved, or are not scheduled to be resolved, in a timely manner. Sixteen (16) of the sixty (60) safety recommendations identified are not resolved and had completion dates as late as June 1, 2015. Assure that all safety recommendations are resolved and the resolution is documented

Anadarko Petroleum Corporation is in the process of waiting on available parts to complete the last of these recommendations. We have a completion date of April 30, 2015 for the last of the recommendations.

4. **Risk Management Plan – Registration [68.160(b)(7)]**

The RMP registration shall include the maximum quantity of each regulated substance or mixture in the process (in pounds) to two significant digits.



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- The Frederick Compressor Station under-reported the maximum quantity of regulated substance onsite, using only the amount of flammable mixture in the one slug-catcher. The following guidance should be used to determine the maximum quantity of regulated substance or mixture in the process: General Guidance on Risk management Programs for Chemical Accident Prevention, EPA 555-B-04-001, March 2009, Section 1.5 threshold Quantity in a Process. A RMP correction shall be submitted reflecting an accurate maximum quantity of flammable mixture in the process at the Frederick Compressor Station.

Anadarko Petroleum Corporation completed this task on February 24, 2015, and the document is enclosed with this parcel.

If you have any questions related to this correspondence, please contact me at 970-515-1266.

Sincerely,

Mike Lutkin 4/2/15

Mike Lutkin
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Enclosure